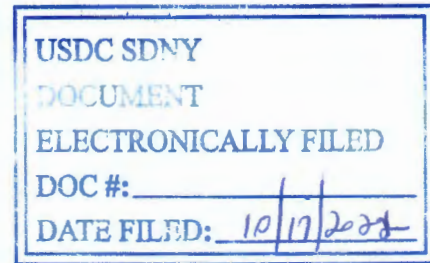




STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL



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MEMO ENDORSED

October 13, 2022

By ECF

Hon. Colleen McMahon
United States Courthouse
500 Pearl Street
New York, NY 10007

10/17/2022
OK, but I will forever
not stay this forever
W

Re: Krull v. Annucci, et al.,
21-CV-03395(CM)(JLC)

Dear Judge McMahon:

I write respectfully on behalf of the plaintiff and the defendants, and pursuant to the Court's September 19, 2022 Order (ECF No. 119), to update the Court on the status of settlement negotiations. Settlement negotiations are ongoing. The parties conferred yesterday as to some preliminary ideas to address both the personal and systemic relief sought by plaintiff. I explained to opposing counsel that given the complex nature of the relief sought, and the fact that two separate state agencies are implicated by the negotiations, additional time is needed to work through the issues in order to formally respond to their demands. As a result, the parties respectfully request that the discovery stay remain in place through November 11, 2022, and that the parties update the Court by that date as to the status of settlement negotiations and proposed next steps.

Thank you.

Respectfully submitted,

/s/ Neil Shevlin

Neil Shevlin

Assistant Attorney General

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cc: Counsel for Plaintiffs (by ECF)

